

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

DEBRA POLLICK	:	
179 Rustlers Road	:	CIVIL ACTION
Bailey, CO 80421	:	
	:	
vs.	:	
	:	
NSI NURSING SOLUTIONS, INC.	:	
2055 E. State Street	:	
East Petersburg, PA 17520	:	

COMPLAINT
IN CONFESSION OF JUDGMENT

1. The plaintiff, DEBRA POLLICK, is an individual and citizen of the State of Colorado residing at 179 Rustlers Road, Bailey, CO 80421.
2. The defendant, NSI NURSING SOLUTIONS, INC., is a business corporation organized under the laws of the Commonwealth of Pennsylvania and has its principal place of business at 2055 E. State Street, East Petersburg, PA 17520.
3. Jurisdiction is proper based on diversity of citizenship, and an amount in controversy exceeding (\$75,000.00) DOLLARS, pursuant to 28 U.S.C. 1332.
4. Plaintiff loaned the sum of \$250,000.00 to defendant, which loan and terms of repayment are evidenced by a Judgment Note, a true and correct reproduction of the original is attached hereto, made a part hereof and labeled Exhibit A.
5. Plaintiff is hereby entering a confession of judgment pursuant to the terms of said Note and warrant.

6. Judgment is not being entered by confession against a natural person in connection with a consumer credit transaction.

7. There has been no assignment of said Judgment Note.

8. Judgment has not been entered on said Judgment Note in any jurisdiction.

9. Defendant has defaulted on payment of said Judgment Note.

10. The following amounts are now due and owing as a result of the default on said Judgment Note:

Principal	\$ 250,000.00
Cost of Suit	275.00
Interest (2.7% per annum compounded quarterly from 1/1/03	573.29
Attorney's Commission (5%)	<u>12,500.00</u>
Total	\$ 263,348.28

11. Plaintiff demands payment of said Judgment Note in the amount of \$263,348.28 as authorized by the warrant of attorney.

Wherefore, plaintiff, Debra Pollick, demands judgment against defendant, NSI NURSING SOLUTIONS, INC. in the amount of \$263,348.28 plus interest, costs and delay damages.

MARVIN A. GOLDBERG, ESQUIRE
Attorney for Plaintiff
Attorney I.D.#: 09208
1334 Walnut Street, 5th Floor
Philadelphia, PA 19107
(215) 732-2000

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NSI NURSING SOLUTIONS, INC.	:	
2055 E. State Street	:	
East Petersburg, PA 17520	:	

NOTICE OF DEFENDANT'S RIGHTS

TO: NSI NURSING SOLUTIONS, INC.
(Defendant)

A judgment in the amount of \$263,348.28 has been entered against you and in favor of the plaintiff without any prior notice or hearing based on a confession of judgment contained in a written agreement or other paper allegedly signed by you. The sheriff may take your money or other property to pay the judgment at any time after thirty (30) days after the date of which this notice is served on you.

You may have legal rights to defeat the judgment or to prevent your money or property from being taken. YOU MUST FILE A PETITION SEEKING RELIEF FROM THE JUDGMENT AND PRESENT IT TO A JUDGE WITHIN THIRTY (30) DAYS AFTER THE DATE ON WHICH THIS NOTICE IS SERVED ON YOUR OR YOU MAY LOSE YOUR RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

Lancaster County Bar Association
28 E. Orange Street
Lancaster, PA 17602
(1-717) 393-0737

Marvin A. Goldberg, Esquire
Attorney for Plaintiff
1334 Walnut Street
Philadelphia, PA 19107
(215) 732-2000

Rule 2958.1 Notice

**OFFICE OF THE CLERK OF COURT
UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**
601 Market Street, Philadelphia, PA 19106

MICHAEL KUNTZ
Clerk of Court

To: NSI NURSING SOLUTIONS, INC.
2055 E. State Street
East Petersburg, PA 17520

DEBRA POLLICK	:
179 Rustlers Road	:
Bailey, CO 80421	:
	:
vs.	:
	:
NSI NURSING SOLUTIONS, INC.	:
2055 E. State Street	:
East Petersburg, PA 17520	:

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

MICHAEL KUNTZ
Clerk of Court

:	Confession of Judgment
9	Money Judgment
9	Judgment in Replevin
9	Judgment for Possession
9	Judgment on Award of Arbitration
9	Judgment on Verdict
9	Judgment on Court Findings

If you have any questions concerning this notice, please call:

Attorney MARVIN A. GOLDBERG, Esquire
(Insert Attorney's Name)

at this telephone number: (215) 732-2000.

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CONFESSION OF JUDGMENT

Pursuant to the authority contained in the warrant of attorney, a copy of which is attached to the complaint filed in this action, I appear for the defendant and confess judgment in favor of the plaintiff and against defendant as follows:

Principal	\$	250,000.00
Cost of Suit		275.00
Interest (2.7% per annum compounded quarterly from 1/1/03		573.29
Attorney's Commission (5%)		<u>12,500.00</u>
Total	\$	263,348.28

Attorney for Defendant